

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN THE MATTER OF)
THE EXTRADITION OF) Case No. 20-mj-1069-DLC
MICHAEL L. TAYLOR)
)

IN THE MATTER OF)
THE EXTRADITION OF) Case No. 20-mj-1070-DLC
PETER M. TAYLOR)
)

DEFENDANTS' NOTICE OF ADDITIONAL SUPPLEMENTAL AUTHORITY

Defendant-Relators Michael L. Taylor and Peter M. Taylor respectfully bring to this Court's attention remarks from the Japanese Minister of Justice, Masako Mori, to the Legal Committee of the Japanese legislature on or about March 6, 2020. *See* Ex. A (Remarks of Japanese Minister of Justice).¹ Among other things, implicitly referencing Ghosn, Minister Mori discussed the need for *new* legislation to punish individuals who "escape" while on bail. She said, *id.* (emphasis added):

Recently, there have been a number of escape cases involving persons who have been sentenced to imprisonment, for example, and accused on bail. In light of this, we have recently consulted with the Legal Council *on the establishment of criminal law* to ensure the escape of these persons and ensure the appearance on trial dates and the execution of penalties. In the future, based on the results of the deliberation, *we will proceed with the necessary legislation.*

Minister Mori's statement provides yet further confirmation that the Japanese government does not currently consider bail jumping to be a crime.

¹ Available at: <http://www.moj.go.jp/hisho/kouhou/syoshinhyoumei201.html>.

Dated: July 3, 2020

Respectfully submitted,

By their attorneys,

/s/ Paul V. Kelly

Paul V. Kelly (BBO No. 267010)
Jackson Lewis, P.C.
75 Park Plaza
Boston, MA 02110
Tel (617) 367-0025
paul.kelly@jacksonlewis.com

/s/ Abbe David Lowell (by permission)

Abbe David Lowell (*pro hac vice*)
Christopher D. Man
Zachary B. Cohen
Winston & Strawn LLP
1901 L Street, N.W.
Washington, DC 20036
Tel. (202) 282-5875
adlowell@winston.com

Counsel for Michael and Peter Taylor

/s/ Robert Sheketoff

Robert Sheketoff (BBO# 457340)
One McKinley Square
Boston, MA 02119
Tel. (617) 367-3449
sheketoffr@aol.com

/s/ Daniel Marino (by permission)

Daniel Marino (*pro hac vice*)
dmarino@marinofinley.com
Tillman J. Finley (*pro hac vice*)
tfinley@marinofinley.com
MARINO FINLEY LLP
800 Connecticut Avenue, N.W., Suite 300
Washington, DC 20006
Tel: 202.223.8888

Counsel for Michael L. Taylor

/s/James P. Ulwick (by permission)

James P. Ulwick (*pro hac vice*)

KRAMON & GRAHAM PA

One South Street, Suite 2600

Baltimore, MD 21202

Tel. (410) 752-6030

JUlwick@kg-law.com

Counsel for Peter M. Taylor

CERTIFICATE OF SERVICE

I, Paul V. Kelly, certify that service of this motion was made on the above date by and through the ECF filing system.

/s/ Paul V. Kelly

Paul V. Kelly